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December 2, 2019

VIA ELECTRONIC CASE FILING

The Honorable Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square, Courtroom 443
New York, NY 10007

Re: Berdeaux v. OneCoin Ltd., et al., Case No. 1:19-cv-04074-VEC (S.D.N.Y.)

Dear Judge Caproni:

This firm, Levi & Korsinsky, LLP, represents Lead Plaintiff Donald Berdeaux and plaintiff Christine Grablis ("Plaintiffs") in the subject action ("Action"). We write in accordance with this Court's August 23, 2019 Memo Endorsement (ECF No. 49) ordering Plaintiffs to file a letter on the first business day of each month (beginning on September 3, 2019) updating the Court on Plaintiffs' efforts to effectuate service of process upon all Defendants who have not already been served.

On August 23, 2019, in response to defendant Mark S. Scott's ("Scott") letter motion to stay the instant Action during the pendency of the criminal trial against Mr. Scott, the Court issued the Court issued an Order staying all proceedings in this Action until Plaintiffs accomplished service upon the remaining Defendants (ECF No. 49). Defendant Scott's criminal trial has since concluded and, on November 21, 2019, a Manhattan federal jury found Defendant Scott guilty on Count One: Conspiracy to Commit Money Laundering and Count Two: Conspiracy to Commit Bank Fraud.¹

As of the date of this letter, four Defendants remain unserved: (1) OneCoin Ltd ("OneCoin"); (2) Ruja Ignatova ("Ignatova"); (3) Sebastian Greenwood ("Greenwood"); and (4) Irina Andreeva Dilinska ("Dilinska") (the "Unserved Defendants"). As discussed in Plaintiffs' November 1, 2019 letter to the Court, Plaintiffs filed a Motion for Leave to Effectuate Alternative Electronic Service upon these foreign Defendants on October 1, 2019 ("Plaintiffs' First Motion for Alternative Service"). On November 1, 2019, the Court denied Plaintiffs' First Motion for Alternative Service without prejudice and suggested that Plaintiffs address the concerns it raised in a renewed application.

Contemporaneous with the submission of this letter, Plaintiffs are filing Plaintiffs' Renewed Motion for Leave to Effect Alternative Service on the Unserved Defendants (the "Renewed

¹ Additionally, during Defendant Scott's criminal trial it was revealed that defendant Konstantin Ignatov has pleaded guilty to the criminal charges issued against him.

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Motion"). Plaintiffs believe that the Renewed Motion addresses and cures the deficiencies in Plaintiffs' First Motion for Alternative Service identified by the Court in its November 1 Order.

Plaintiffs are available at the Court's convenience to respond to any further questions as may arise.

Very truly yours,

LEVI & KORSINSKY, LLP

By: /s/ William J. Fields
William J. Fields

cc: all counsel of record (via ECF)